

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

)
) MDL No. 2:18-mn-2873-RMG
)
)
) This Document Relates to:
) ALL CASES
)

**DEFENDANT DYNAX CORPORATION'S RESPONSES TO
PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION**

Defendant Dynax Corporation ("Dynax"), by and through undersigned counsel, and pursuant to Rule 36 of the Federal Rules of Civil Procedure, hereby responds to Plaintiffs' First Set of Requests for Admission ("Requests") as follows. The responses set forth below are provided in good faith and are based upon information Dynax has gathered to date. Dynax may, and reserves the right to, supplement these responses with different or additional information in the future.

OBJECTIONS TO PLAINTIFFS' INSTRUCTIONS AND REQUESTS

1. Dynax objects to Plaintiffs' "Instructions" to the extent they seek more than is required under the Federal Rules of Civil Procedure and the applicable Orders in this case.

2. Dynax objects to each and every Request to the extent the Request is not relevant to the claims and defenses of any party. Any response to any Request shall not be construed as a concession or admission that any response, testimony, document related thereto is relevant or otherwise admissible in this action, nor shall any response constitute or be construed as a waiver of any objection to the admissibility of such responses, testimony, or documents related thereto. All objections to the use, at trial or otherwise, of any document or piece of information disclosed in response to the Requests are expressly reserved.

3. Dynax objects to each and every request to the extent it seeks information, testimony, or documents protected by the attorney-client privilege, the attorney work-product doctrine, and/or other evidentiary privileges or other applicable protections, immunities, or restrictions upon discovery. Nothing contained in either these objections, responses, or in any testimony or documents related thereto is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, attorney work product protection, or any other applicable privilege or doctrine. If Dynax withholds any documents on the basis of privilege, Dynax will provide a privilege log that identifies the documents in accordance with the Protocol on Privileged Information. If protected information or documents are inadvertently produced in response to the Requests, the production of such information or documents shall not constitute a waiver of Dynax's rights to assert the applicability of any privilege, protection, or immunity to the information or documents, to seek return of such material, or to object to the use of such material at any stage of the action or in any other action or proceeding, as provided in the Protective Order Governing Confidential Information ("Protective Order").

4. Dynax objects to each and every request to the extent it seeks Dynax's private, confidential, trade secret, commercially sensitive, or proprietary information.

5. Dynax will limit any potential search for responsive documents and information to the sources and custodians identified by Dynax, agreed to by the parties, or ordered by the Court. Absent such agreement or order, Dynax will not search for or produce documents from any other source or location.

6. Dynax objects to each and every request to the extent it seeks third-party private, confidential, trade secret, or proprietary information, which information has been maintained in confidence and subject to contractual or court-ordered limitations on disclosure.

7. Dynax objects to each and every request to the extent it seeks responses, testimony, or documents related thereto not in Dynax's possession, custody, or control. In responding, Dynax will not attempt to provide testimony or documents that are unavailable or outside of its possession, custody, or control.

8. Dynax objects to each and every request to the extent that it seeks information that is equally obtainable by Plaintiffs from another source, including publicly available information.

9. Dynax objects to each and every request as overbroad, unduly burdensome, not relevant to the claims or defenses in this case, and not proportional to the needs of the case, to the extent it seeks information from outside of the United States. Except where otherwise indicated, Dynax's responses will be limited to information about Dynax's chemical products which may have been used in the United States in aqueous film-forming foam applications.

10. Dynax's responses to these Requests are based upon its good faith interpretation of the Requests. Should a different interpretation of any Request be asserted, Dynax reserves the right to add to, modify, or otherwise change or amend these responses.

11. Dynax's responses to these Requests are based only upon facts known at this time. Discovery in this matter is ongoing, and during the course of subsequent discovery, Dynax may become aware of supplemental, additional, or other responsive information. Dynax reserves the right to update, amend, or supplement these responses. In addition, these Requests are made without prejudice to Dynax's right to present further additional or other evidence or contentions in a motion for summary judgment, at trial, or otherwise, based upon information hereafter identified, obtained, or developed.

12. These objections are hereby incorporated into each Response to the specific Request below.

OBJECTIONS TO PLAINTIFFS' DEFINITIONS

1. Dynax objects to Plaintiffs' Definitions and Requests in full because Dynax did not make or sell AFFF, PFOS, or PFOA and Plaintiffs' Requests seek to impose an undue burden upon Dynax which is not proportional to the needs of this case or "the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit." *See* F.R.C.P. 26 (b)(1).

2. Dynax objects to Plaintiffs' "Definitions" to the extent they attempt to impose duties and obligations on Dynax that exceed those imposed or authorized by the Federal Rules of Civil Procedure, the Local Rules of this Court, agreements between the Parties, or the Court's orders, including, but not limited to, the extent to which they exceed the permissible scope of discovery, and/or seek to impose duties of responding and/or supplementation different from or in excess of those imposed by the applicable rules, agreements, and orders.

3. Dynax objects to Plaintiffs' "Definitions" to the extent they are overly broad and unduly burdensome because they seek to have Dynax provide information that is not within Dynax's possession, custody, or control and/or attempt to impose on Dynax obligations beyond those which are required under the Federal Rules of Civil Procedure. Dynax further objects to the extent they request information that is protected from discovery pursuant to the attorney-client privilege, work product doctrine, or any other applicable privilege under state or federal law.

4. Dynax objects to Plaintiffs' definition of the terms "YOU," "YOUR," and "DEFENDANT" on the grounds that Dynax has no affiliation with Defendant The 3M Company.

5. Dynax objects to Plaintiffs' definition of "AFFF" to the extent it is vague, ambiguous, and overbroad. "AFFF" shall be construed to mean aqueous film-forming foam sold in the United States. Dynax never manufactured AFFF for sale and never sold AFFF or any product containing AFFF.

6. Dynax objects to Plaintiffs' definitions on the grounds that they include numerous defined terms that appear nowhere in the Requests for Admission.

7. Dynax's foregoing objections to Plaintiffs' definitions are hereby incorporated by reference in its response to every Request which includes defined terms.

FURTHER OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION

1. Admit that the Dynax website states as follows: Dynax is the largest producer and supplier of specialty fluorochemicals to the fire-fighting foam industry in the world.

RESPONSE:

Admitted that as of the date of this response, the Dynax website (dynaxcorp.com) contains the following sentence: "Today, as the largest producer and supplier of specialty fluorochemicals to the fire-fighting foam industry in the world, Dynax continues to actively develop innovative fluorochemicals to further strengthen its growing leadership." Otherwise denied.

2. Admit that in 2001 Dynax joined the Fire Fighting Foam Coalition as a founding member.

RESPONSE:

Admitted.

3. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX3001 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject

to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

4. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX5011 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

5. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX5013 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

6. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1020 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject

to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

7. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX2200 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

8. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1030 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

9. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1080 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject

to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

10. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX5022 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

11. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1026 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

12. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1090 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject

to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

13. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1025 was marketed and/or sold for the purpose of creating AFFF concentrates that would meet military specification MIL-F-24385 ("MIL-Spec").

RESPONSE:

Dynax objects to this request for admission insofar as it asks whether Dynax took actions "for the purpose of creating AFFF concentrates," because Dynax has never manufactured AFFF agents for sale and has never sold AFFF agents or any product containing AFFF agents. Subject to and without waiving its objections, while Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products, Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas, and therefore Dynax lacks sufficient information to answer this request.

14. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX3001 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

15. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX5011 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

16. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX5013 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

17. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1020 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

18. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX2200 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

19. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1030 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

20. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1080 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

21. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX5022 was marketed, manufactured and/or sold to formulators

who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

22. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1026 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

23. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1090 was marketed, manufactured and/or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

24. Admit that the Dynax fluorosurfactant identified in Exhibits A and B to the March 17, 2021, Defense Fact Sheet as DX1025 was marketed, manufactured and /or sold to formulators who used Dynax fluorosurfactants to produce AFFF concentrates that were on the Department of Defense's Qualified Product List, and known to be distributed nationwide.

RESPONSE:

Dynax objects to this request for admission insofar as it calls for information not in Dynax's possession, custody, or control. Subject to and without waiving its objections, Dynax believes that its products have been incorporated into numerous Mil-Spec AFFF products appearing on the Department of Defense's Qualified Products List. However, because Dynax does not determine whether or how an AFFF manufacturer uses Dynax's fluorosurfactants in its AFFF formulas or where any AFFF product that may contain its fluorosurfactants may be sold, Dynax lacks sufficient information to answer this request.

This the 9th day of July, 2021.

SMITH, ANDERSON, BLOUNT, DORSETT,
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CERTIFICATE OF SERVICE

I certify that on July 9, 2021, a copy of the foregoing was served via electronic mail upon the following individuals:

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EXHIBIT F